

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA	§	
	§	
v.	§	CRIMINAL NO. 4:18-CR-575
	§	(HUGHES)
JACK STEPHEN PURSLEY,	§	
AKA STEVE PURSLEY,	§	
Defendant.	§	

DECLARATION OF GRACE E. ALBINSON
RELATED TO GOVERNMENT’S REQUEST TO AUTHORITIES IN THE ISLE OF
MAN

GRACE E. ALBINSON, pursuant to 28 U.S.C. § 1746, hereby declares under penalty of perjury, to the best of her information and belief:

1. I am a Trial Attorney with Southern Criminal Enforcement Section of the Tax Division, United States Department of Justice, and I submit this Declaration pursuant to the Court’s order dated November 20, 2018, stating that the Government must coordinate with the U.S. Department of State in connection to its request to the authorities in the Isle of Man.

2. On December 4, 2018, the Government held a telephone conference with the following individuals: 1) Tom Heinemann, Assistant Legal Adviser, Law Enforcement and Intelligence, Office of the Legal Adviser, U.S. Department of State; 2) Amber Kluesener, Supervisory Paralegal, Extradition Unit, Office of Law Enforcement and Intelligence, Office of the Legal Adviser, U.S. Department of State; and 3) Erin Mikita, attorney with the Office of International Affairs with the U.S. Department of Justice.

3. The Government explained that it had obtained a court order to submit a request with the authorities in the Isle of Man, under the treaty between the governments of the United

States of America and the United Kingdom of Great Britain and Northern Ireland on Mutual Legal Assistance in Criminal Matters extended to the Isle of Man, for a deposition of Kerry Smith in the Isle of Man.

4. Mr. Heinemann stated, in sum and substance, that the Department of State had no objections to, and no concerns with, the Government's proposed course of action as the Government was using the appropriate treaty process.

DATED: December 4, 2018

Respectfully Submitted,

RYAN K. PATRICK
United States Attorney
Southern District of Texas

By: /s/ Grace Albinson
Nanette L. Davis, Senior Litigation Counsel
Grace E. Albinson, Trial Attorney
Jack A. Morgan, Trial Attorney
U.S. Department of Justice, Tax Division
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on December 4, 2018, I electronically filed the foregoing document, under seal, with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

By: /s/ Grace Albinson

Nanette L. Davis, Senior Litigation Counsel

Grace E. Albinson, Trial Attorney

Jack A. Morgan, Trial Attorney

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